



# TITLE VI ANALYSIS OF REIMAGINE METRO FIXED ROUTE NETWORK REDESIGN

Public comments are due by March 1st, 2023 at 8pm.



## **METRO RTA Title VI Analysis of Reimagine METRO Fixed Route Network Redesign**

### **1) Introduction and Purpose**

This document describes the Title VI Service Equity Analysis for the major service changes associated with METRO's Reimagined Fixed Route bus network, projected to be implemented in June 2023.

The Federal Transit Administration (FTA) requires transit agencies to complete an equity analysis for any major service change to comply with Title VI of the Civil Rights Act of 1964. Any "major service change" must be evaluated to ensure that the planned changes will not disparately impact minority populations and/or disproportionately burden low income populations". The Federal Transit Administration (FTA) has established regulations to comply with Title VI and Environmental Justice requirements in circular FTA C 4702.1B – *Title VI Requirements and Guidelines for Federal Transit Administration Recipients*. All FTA recipients, such as METRO RTA, must comply with these regulations.

### **2) METRO Title VI Policies**

In alignment with the requirements set forth in the above-mentioned federal regulations, METRO has developed agency policies to ensure compliance with all Title VI equity analysis requirements.

#### **a. Major Service Change Definition (adopted May 2013)**

METRO's approved policy defines a major service change as any change that:

- Affects 25 percent or more of service hours or revenue miles;
- Eliminates a route or portion of a route resulting in an area having no alternative service within one-quarter of a mile;
- Creates a new transit route.

#### **b. Service Equity Analysis Policy (adopted May 2013)**

METRO RTA's policy will be to conduct equity analyses of major planned service and fare changes prior to implementation. The evaluation will include:

- A comparison of the minority population served before and after the planned change;
- A comparison of the low income population served before and after the planned change; and
- Comparisons of transit service quality before and after the planned change, as measured by service headway, directness of service, span of service and vehicle load factors.

The analysis shall consist of one of two (2) methodologies:

- Prescriptive
  - Create maps
  - Measure service span and modes
  - Assess alternatives, travel times, costs
  - Determine if disproportionate impact (see next section)
  - Identify Alternatives or Mitigate impact, if necessary (see next section)
- Narrative
  - Evaluate changes during service planning
  - Explain the methodology
  - Determine if disproportionate impact (see next section)
  - Identify Alternatives or Mitigate impact, if necessary (see next section)

**c. Disparate Impact and Disproportionate Burden Policy (adopted May 2013)**

According to METRO's policy, a major service change should not adversely affect (loss) or benefit (gain) a minority or low-income population twenty percent (20%) more or less than non-minority or non-low income populations as determined by demographic analysis of proposed changes and U.S. Census data and/or transit rider survey data.

This level of impact will be considered a disparate impact on minority populations, or a disproportionate burden on low income populations.

The determination of adverse impact is based on the federal standard described in Uniform Guidelines published by the Equal Employment Opportunity Commission (EEOC) known as the "four-fifths rule." This standard requires benefits to accrue to unprotected populations at a rate at least four fifths (or 80%) of the rate for protected populations. The maximum acceptable difference (positive or negative) in level of benefit between protected and unprotected populations is 20 percent.

If a major service change would result in a disparate impact or disproportionate burden, METRO RTA will:

- Consider modifying the proposed service change; and
- Analyze the modification to evaluate whether the potential disparate impact or disproportionate burden has been removed.

**3) Reimagine METRO Planning Process**

METRO's Board of Trustees adopted a new Strategic Plan in November 2020. The Strategic Plan identified a set of goals for METRO to pursue over the next decade such as: improved service quality, economic opportunity and cost effectiveness that will lead to building a transit system that is advantageous for more people. Specifically, the plan instructed METRO to focus fixed

route services on METRO's highest ridership corridors, as well as serving markets where (and for whom) transit is essential.

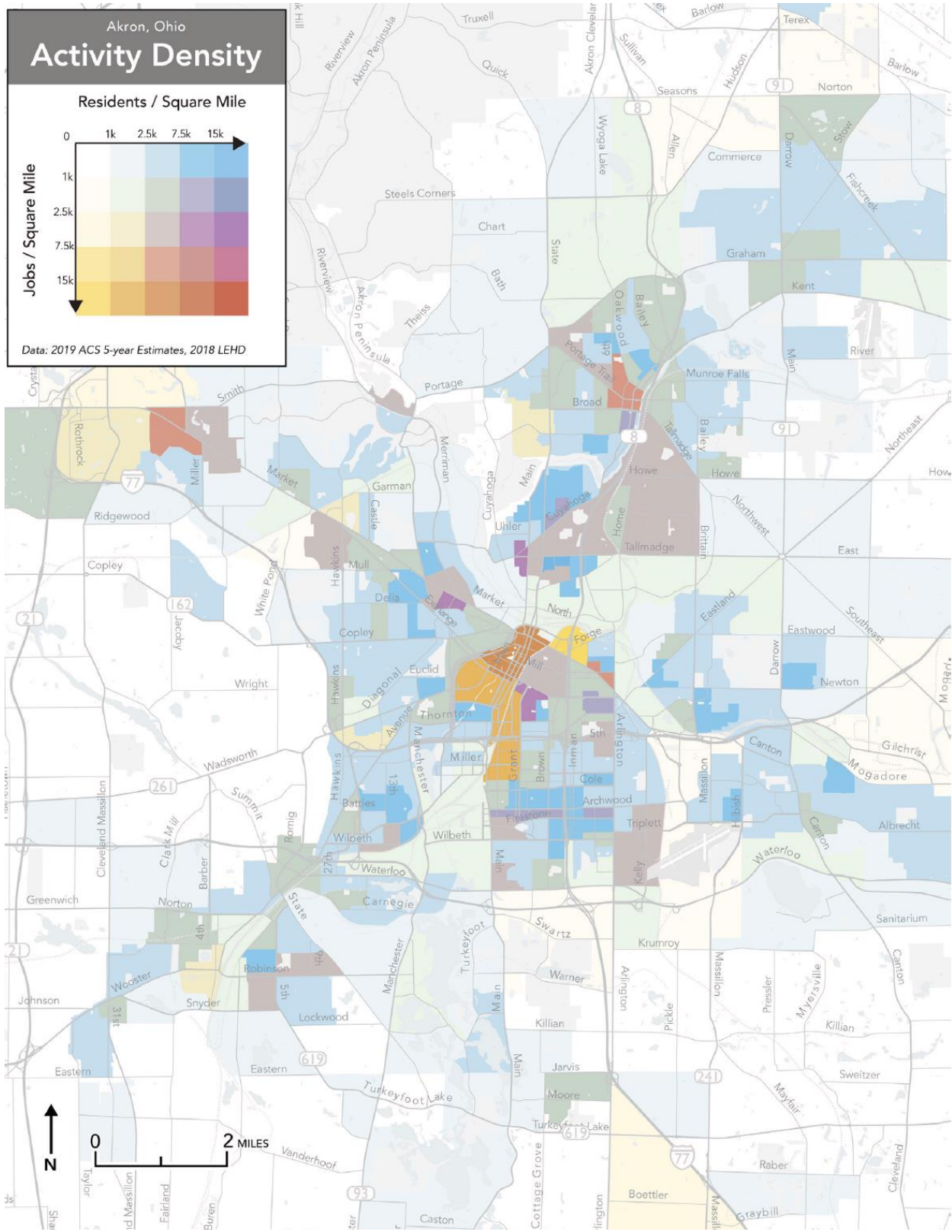
Following the direction of the Strategic Plan, METRO began the process of creating a Transit Development Plan (TDP) outlining recommendations for both fixed route and demand response services. (This equity analysis is focused on the fixed route recommendations only.)

The TDP began with an operational analysis of the existing METRO network, followed by two phases of network development and public outreach.

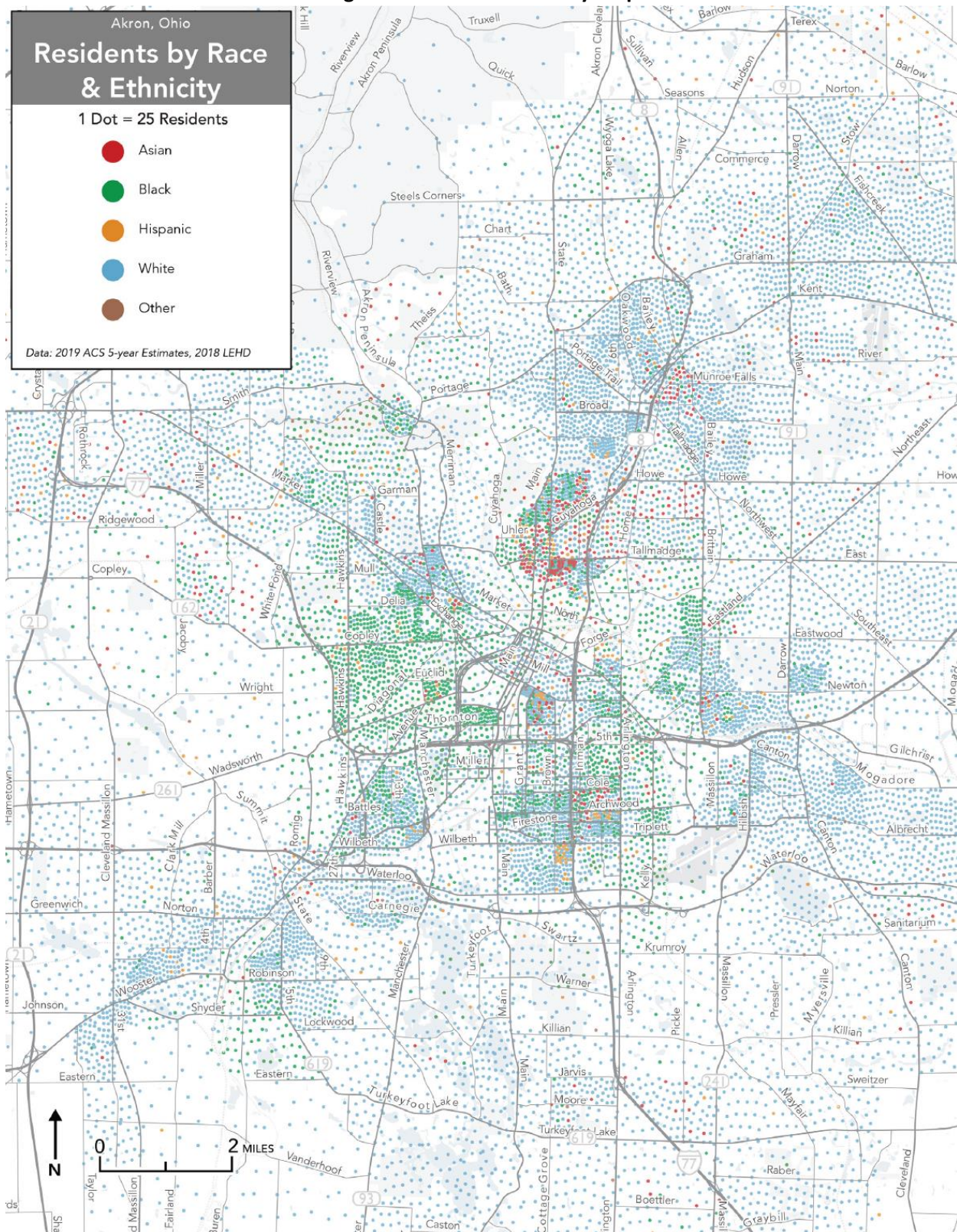
**a. Operational Analysis (Existing Conditions and Choices)**

This phase presented the current market and need for transit service in Summit County, examined the transportation services currently provided by METRO RTA, described the challenges of existing service for riders and the general public, and outlined key choices to be made in deciding whether and how to make changes. The Operational Analysis Report mapped out the residential and job density, along with approximate locations of minority populations. Maps are shown in Figures 1 and 2 on the following pages.

Figure 1 - Activity Density Map



### Figure 2 - Race and Ethnicity Map



## **b. Phase 1 Network Design and Outreach**

During the engagement period for the 2020 Strategic Plan, METRO heard from members of the community that high-frequency service should be a priority in a network redesign. That process did not create a scenario that illustrated how changes to the network would look. The first task of the Reimagine METRO TDP process was to design a Draft Reimagined Network that showed explicitly, with lines on a map, how a redesigned network could look based on the Strategic Plan's direction.

Phase 1 was intended to show people how the network redesign could look, verify whether the direction of the Strategic Plan was still valid, and whether people were still favorable towards a frequency-focused redesign when presented with the likely impacts on their own routes. A positive reaction of the Draft Reimagined Network would indicate that METRO was generally on the right track with its network redesign. The secondary goal in Phase 1 was to develop a list of network design changes that needed more work, including destinations that needed to be served more directly.

Outreach was conducted in a variety of in-person and virtual methods for both the public, stakeholders and METRO team members. During Phase 1, a majority of survey respondents agreed that the Draft Reimagined Network embodied the right balance of high frequency and coverage services. A majority of respondents also agreed that the Draft Reimagined Network would make their personal transit trips faster and beneficial for their neighborhood. Specific comments on coverage gaps were received and reviewed by the team.

## **c. Phase 2 Network Design, Growth Scenarios and Outreach**

After the first phase of engagement, METRO and the consultant team revised Draft Reimagined Network based on comments received and developed the two growth scenarios.

Phase 2 focused on showing the Revised Reimagined Network and Growth Scenarios to the public, asking whether the Growth Scenarios were the right priorities for future service expansion if METRO had more funding to run bus service.

Planning and execution of Phase 2 occurred during the Covid-19 Omicron variant surge, which limited the degree of in-person engagement possible. As a result, the only in-person public event during this phase was the RKP Transit Center open house. In an effort to broaden the reach of the engagement effort, METRO distributed a mailer with project information to the majority of addresses in Summit County and took out newspaper advertisements providing information on the project in all local newspapers. A press release was also issued that resulted in multiple news articles being published. Additional inreach events, a virtual stakeholder workshop, and a public webinar were also held.

During Phase 2, additional comments on the Reimagined Network were received and considered – which resulted in minor network changes. For the Growth Scenarios, 64 percent of people who took the survey said that the Growth Scenarios appeared to be a

good way to expand service while just 16 percent disagreed. (This report focuses only on the Reimagined Network using METRO's existing resources; it does not include analysis on the Growth Scenarios).

#### **d. Final Transit Development Plan**

Following Phase 2, the Transit Development Plan document was developed (found here: <https://www.reimagine-metro.com/overview>). After the TDP plan for finalized, field tests were conducted to verify route alignments and route timing. As a result of these field tests, additional minor routing adjustments were made, which are represented in the maps in the following section.

### **4) Existing and Proposed Reimagine METRO Networks**

METRO's Existing Network and Reimagined Network maps are shown on the following pages. These maps show each route color-coded based on the frequency of runs in the middle of the day on weekdays. Frequency is a critical factor in understanding how a transit network works, because frequency determines waiting time, and waiting time is a key element of overall travel time. Routes that require longer waits are less likely to be useful to many people, since accessing them requires accepting either a long wait, or careful planning to make sure you arrive at the stop on-time.

#### **a. Existing Network**

Today, METRO operates a network in Akron where most routes come only every 30 or 60 minutes. 20-minute service is available on Market (1) and Arlington (2), two of METRO's busiest corridors. Routes run every 30 minutes on Howard/Main (10), Copley (3), Euclid/Romig (14), Kenmore (8) and East Market / Canton (6). This radial structure ensures that a selection of 20 or 30 minute routes make travel in and out of downtown possible from all directions throughout the city along the major commercial roads, while lower-frequency services are close at hand in residential areas.

Most people served by METRO's existing network have access to only lower frequency service. While 74 percent of the Summit County population live further than a 1/4-mile walk from transit, of the 26 percent who do live near a transit stop, over half are near only hourly service. Only 3 percent of the County's population, or 12 percent of people served, are near METRO's most frequent lines (1 and 2)

#### **b. Reimagined Network**

The Reimagined Network is designed to achieve higher ridership by focusing more of METRO's resources on providing more frequent service on busy corridors where a significant number of people need to travel.

It includes:

- *A Frequent Network with 5 routes.* Routes would run every 15-minutes on West Market, Arlington, Euclid, Grant & Brown, and East Exchange near the University

of Akron. Currently, METRO's only 15-minute service is the short DASH downtown shuttle.

- *New 30-minute services.* Routes serving Cuyahoga Falls and Goodyear Heights would be upgraded from the current hourly service.
- *New intercity connections.* New routes would connect Akron to Kent and southern Cuyahoga County.
- *More consistent service in Northern Summit County.* Two new routes, 31 and 32, would run every hour on weekdays and Saturdays through Hudson, Twinsburg, Stow and Macedonia, continuing on to Northfield and ending at Southgate Transit Center in Cuyahoga County.

With the Reimagined Network, while 75 percent of the Summit County population live further than a 1/4-mile walk from transit, this is similar to the coverage of the existing network in which 74 percent of the Summit County population lives further than a ¼ mile walk from transit. 24 percent of people who live near transit in the Reimagined Network can access frequent service (15-min).

Existing and Proposed Reimagine METRO Network maps can be found in Figures 3 and 4 on the following pages.

**Figure 3 - Existing Network Map**

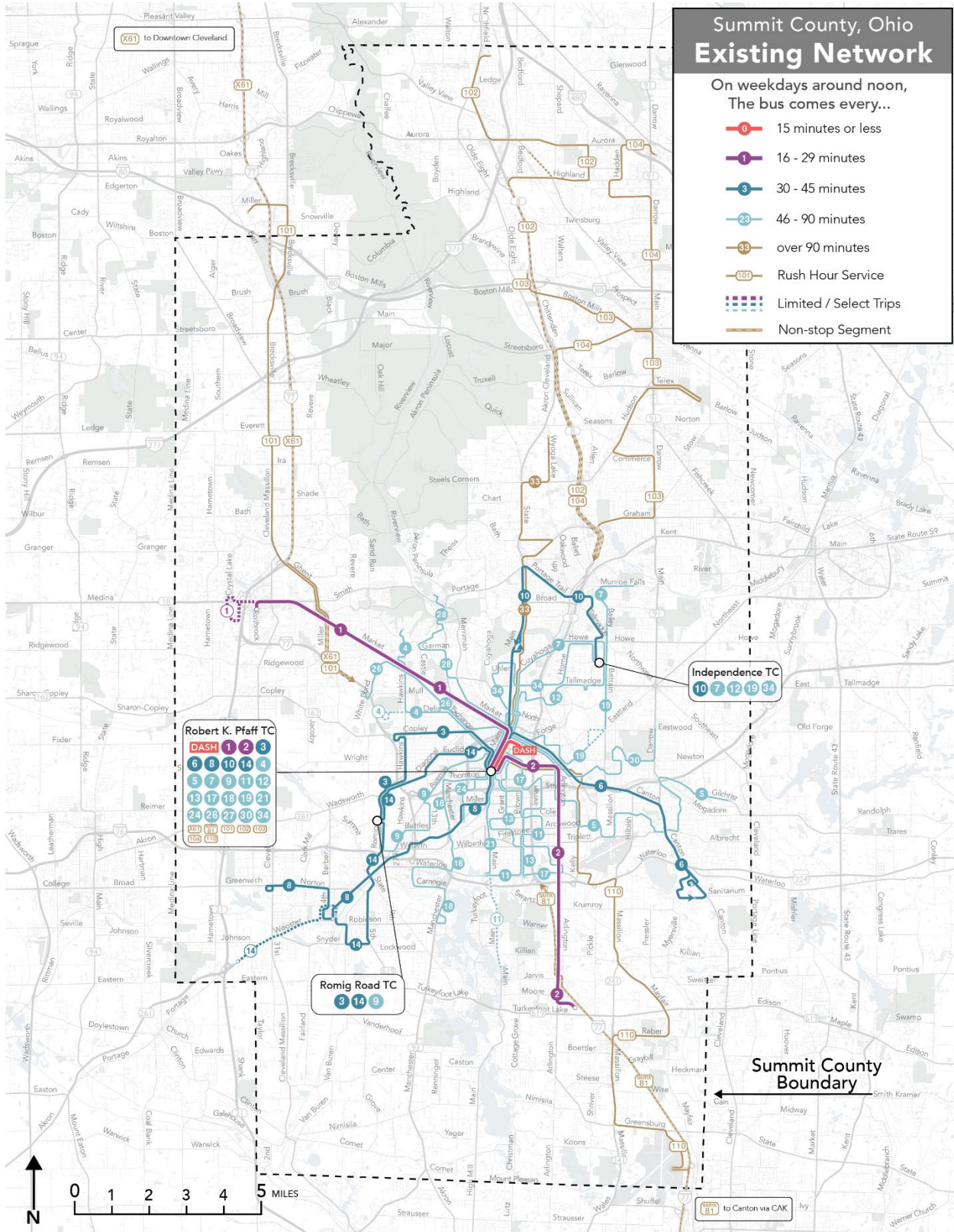
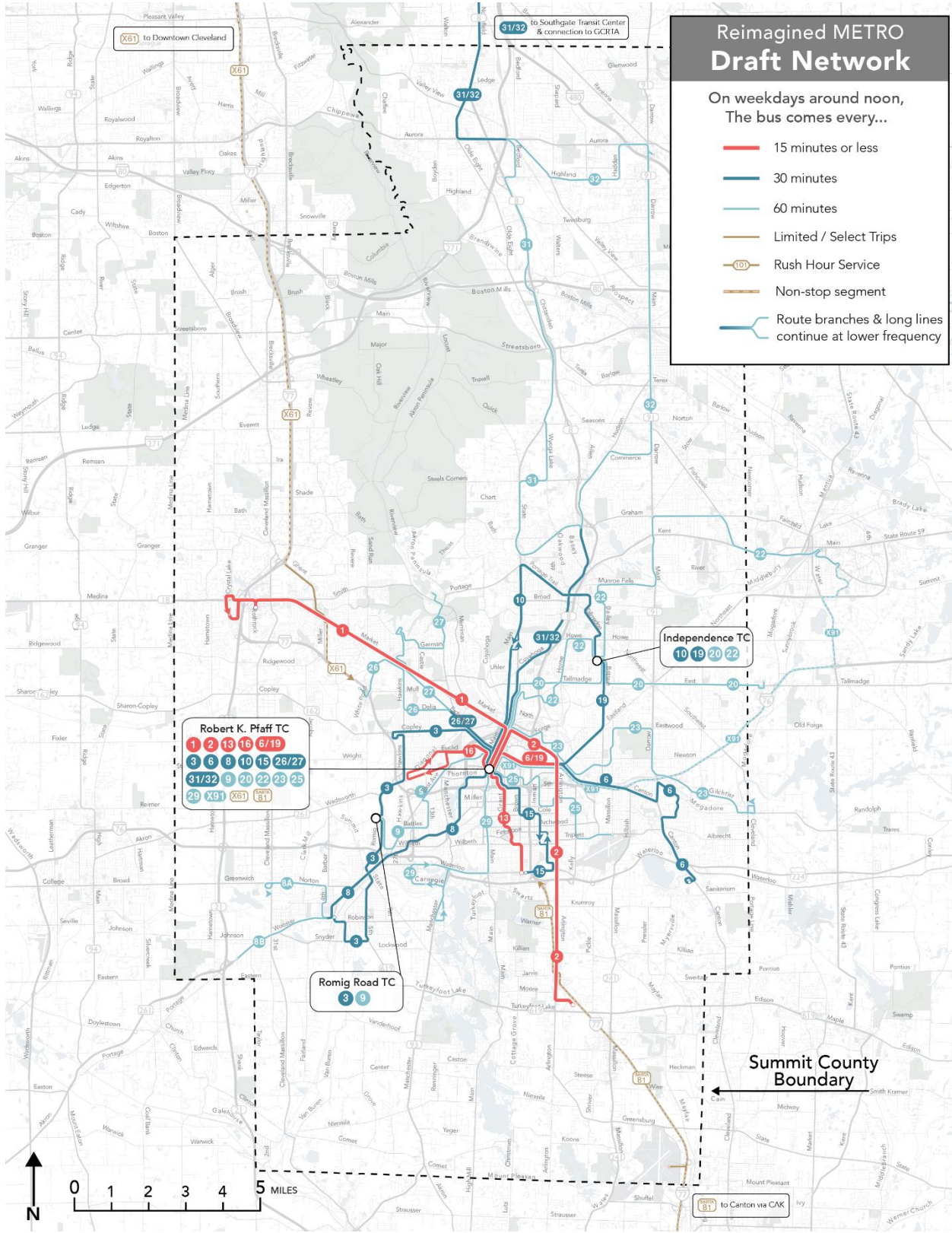


**Figure 4 – Reimagine METRO Proposed Network Map**



## 5) Service Equity Analyses

Given the magnitude of the system-level changes proposed with the Reimagined Network as described in previous sections, this qualifies as a major service change per METRO's policy. The changes are not on a route-by-route basis, but rather an evaluation and re-allocation of resources within the entire bus network (as shown when comparing Figures 3 and 4). For that reason, the service equity analysis will be conducted as a comparison of the entire existing bus network vs. the entire Reimagined Bus network. A direct route-to-route comparison would fail to capture the network-level impact of the proposed changes.

METRO's Service Equity Analysis requires either a prescriptive or narrative analysis of major service changes, as described in the previous section. This analysis will take the prescriptive approach and will focus on a comparison of minority/non-minority and low income/non-low income impacts in the following three categories:

- People Trips – The people-trips method focuses on changes in the amount of service provided near people. The goal of this method is to determine how the number of annual bus trips near minority and low-income populations changes in comparison to the amount of service near non-minority and non-low-income populations.
- Access to Opportunity – The access analysis method focuses on changes in the usefulness of service to different populations. This method seeks to establish how many destinations people can reach in a defined amount of time (typically 45 minutes), using transit and walking. The goal is to evaluate how minority and low-income populations are affected compared to other groups.
- Service Standards – As stated in the policy, the analysis will compare service headways, route directness, service span and vehicle loads of the existing and Reimagine METRO networks and the impact to minority and low income populations.

### a. People-Trips

This method uses the following procedure to calculate service quantity:

- For each Census block group, the population (U.S. Census 2020 American Community Survey 5-year data) is taken for each demographic group, which is assumed to be evenly distributed within the block group.
- For each bus route that serves the Census block group, the number of times that bus route runs annually is calculated. Any bus trip that has a bus stop within 1/4 mile of the Census block group is considered to serve that block group.
- The population of the block group multiplied by the number of times a bus trip serves that block group is calculated as people-trips.
- The people-trips for all block groups are then summed and expressed as total service area people-trips.

- This calculation is done for both the existing and planned networks, and for various demographic groups.

The total number of people-trips is therefore a measure of both service quantity and the number of people who are located near the service. The table below shows the system-level aggregate change in people-trips based on all proposed service changes in the Reimagined Network Redesign plan.

**Table 1 – People-Trips Comparison**

| People-Trips within 1/4 Mile of METRO Transit Service |               |                         |                             |                       |                           |
|-------------------------------------------------------|---------------|-------------------------|-----------------------------|-----------------------|---------------------------|
| Network                                               | Person-Trips  | Low-Income Person-Trips | Non Low-Income Person-Trips | Minority Person-Trips | Non-Minority Person Trips |
| Existing                                              | 4,377,660,930 | 1,176,257,967           | 3,201,402,963               | 1,796,115,330         | 2,581,545,600             |
| Reimagined                                            | 5,854,742,850 | 1,520,816,089           | 4,333,926,761               | 2,429,119,905         | 3,425,622,945             |
| # Change in Person-Trips                              | 1,477,081,920 | 344,558,122             | 1,132,523,798               | 633,004,575           | 844,077,345               |
| % Change in Person-Trips                              | 33.7%         | 29.3%                   | 35.4%                       | 35.2%                 | 32.7%                     |

Table 1 shows the number of people-trips within ¼ of transit service increases by 33.7 percent across the entire Summit County population. The increase is 35.2% for Minority populations and 29.3 percent for Low Income populations.

On the following pages, Figures 5 and 6 show maps of the existing and Reimagine METRO networks overlaid on approximate locations of minority populations in Summit County. Figures 7 and 8 show maps of the existing and Reimagine METRO networks overlaid on approximate locations of low income populations in Summit County.

Figure 5 – Existing Network and Minority Population

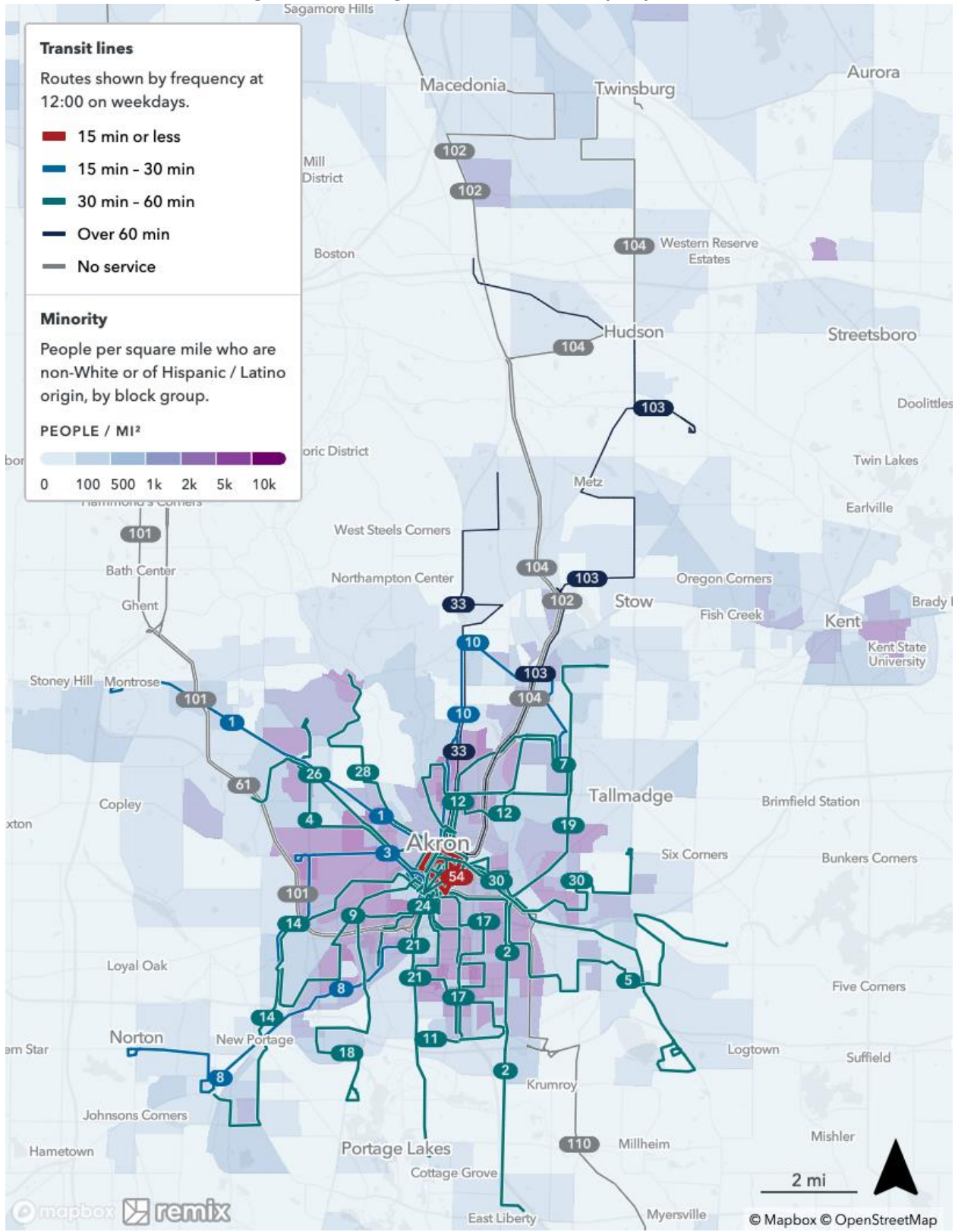


**Figure 6 – Reimagine METRO Network and Minority Population**

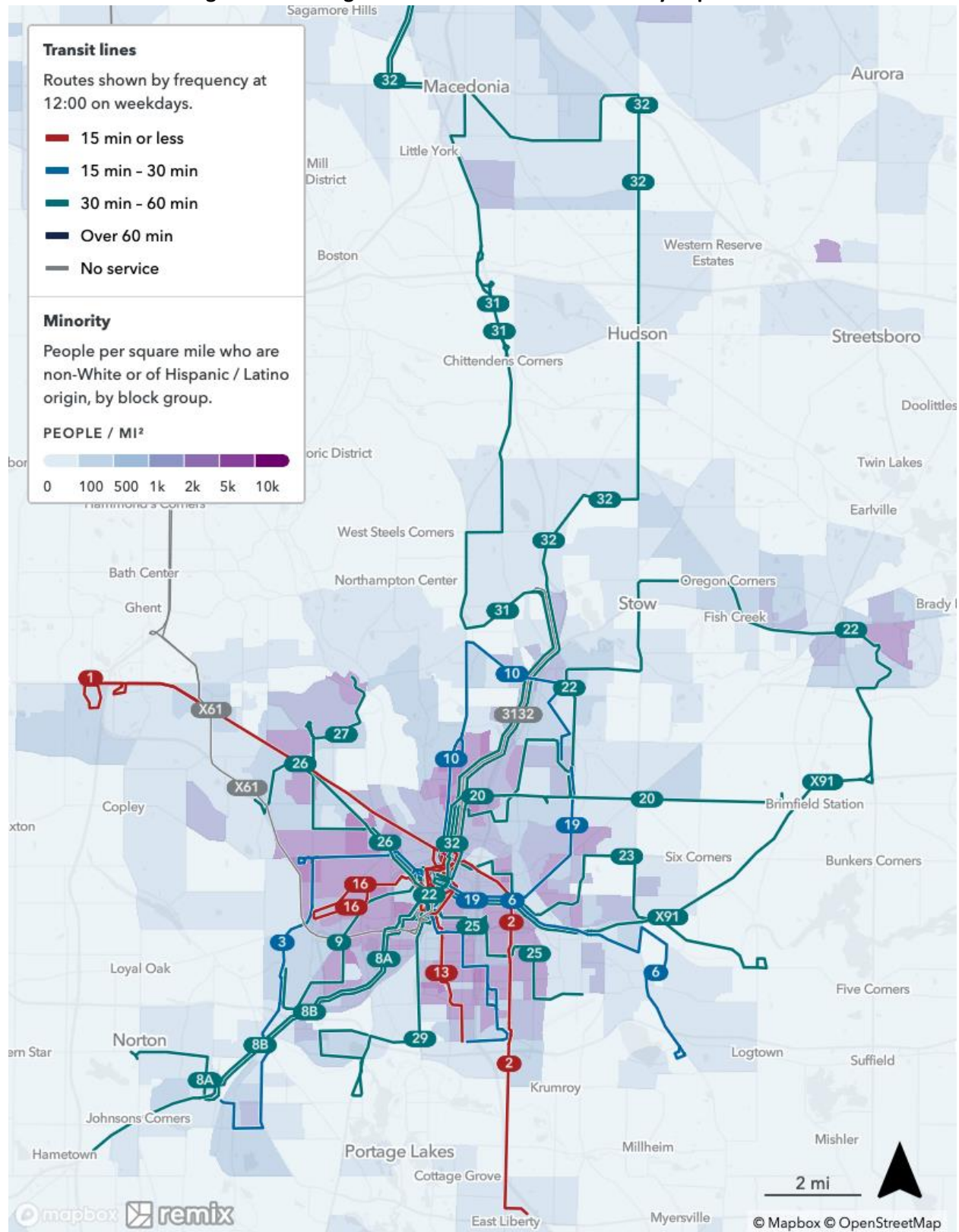
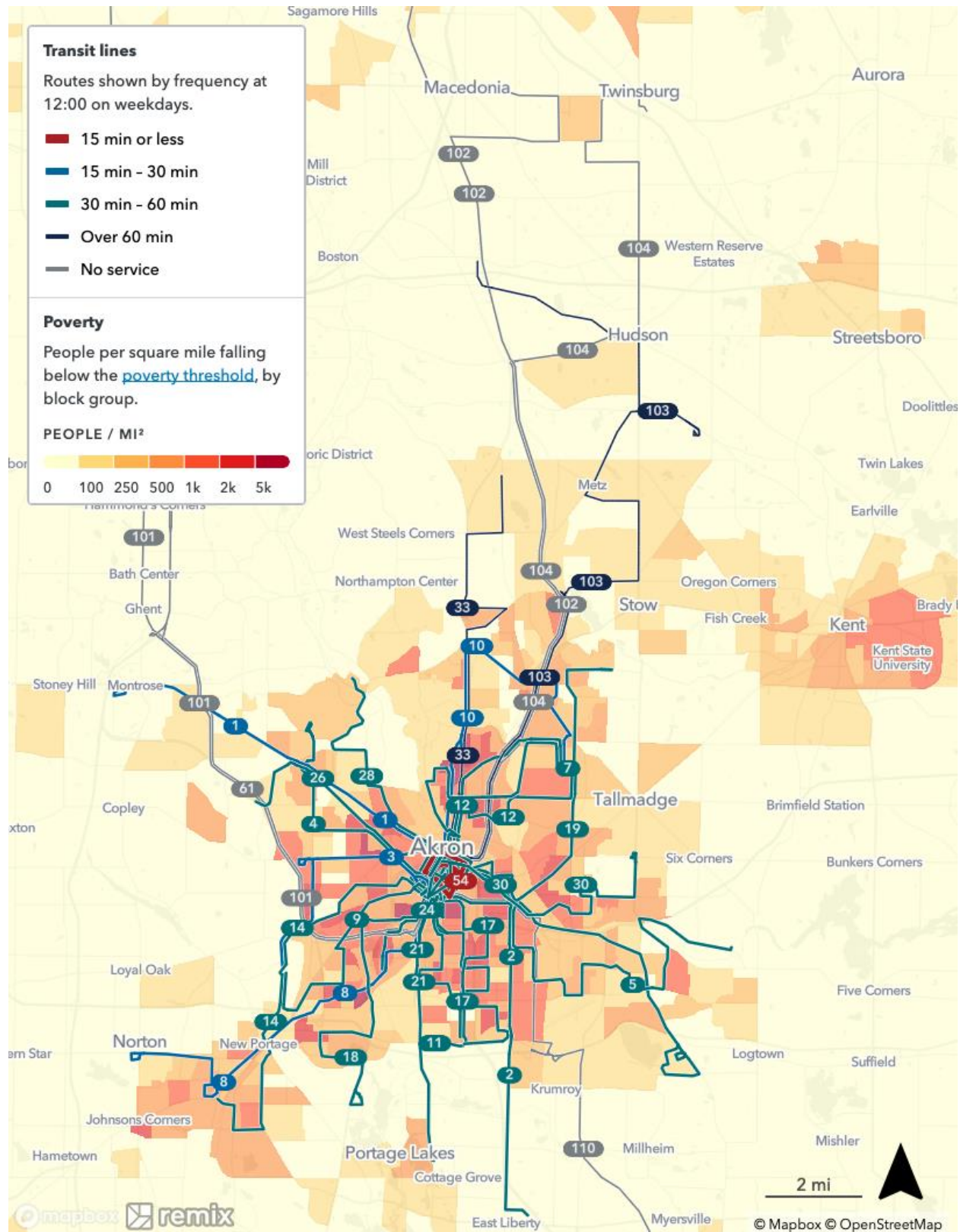


Figure 7 – Existing Network and Low Income Population



**Transit lines**  
Routes shown by frequency at 12:00 on weekdays.

- 15 min or less
- 15 min - 30 min
- 30 min - 60 min
- Over 60 min
- No service

**Poverty**  
People per square mile falling below the poverty threshold, by block group.

PEOPLE / MI<sup>2</sup>

0 100 250 500 1k 2k 5k

Map of Columbus, Ohio, showing transit lines and poverty levels. The map uses color-coded lines for transit frequency and a color gradient for poverty levels. A legend in the top left explains the symbology.

## **b. Access to Opportunity**

With access analysis, we can measure the number of jobs reachable from different places in 45 minutes using transit with the Reimagined Network scenario and the Existing Network. Measuring access to jobs tells us about more than just where you can work. Most places where people need to travel, are also places many people work, for example: universities, shopping centers, or hospitals. Job access is one way of measuring how likely the transit network will be useful for the trips you need to make.

The map on the following page (Figure 9) shows the change in job access for people living near transit throughout Summit County with the implementation of the Reimagine METRO network. Green areas are places where more jobs would be reachable in 45 minutes compared to today. Brown areas are where fewer jobs would be reachable. The Reimagined Network is overlaid on top, showing how frequently each route would run.

With the Reimagined Network, job access for people living near transit would improve across much of the central area of Akron and surrounding suburban communities. The main reason for this is that new 15-minute frequent service routes (such as Route 1-West Market or Route 13-Grant/Brown) would reduce the average waiting time to begin a trip.

Access would also improve in many other places, even areas that are not on a 15-minute route. In some cases, this is due to improved service from hourly to every 30 minutes.

When we aggregate this analysis, while some areas will see a loss of job access in the Reimagined Network, many more people in Summit County live in places where transit would be more useful for reaching jobs and other destinations. As a result, the median number of jobs reachable for people living in places near service increases substantially when compared to the existing network. This is shown in the Figure 10 on the following pages.

This substantial increase is seen for all residents (+53%) and even more significantly for minority residents (+89%) and low income residents (+104%).

**Figure 9 – Reimagine METRO Job Access (Map)**

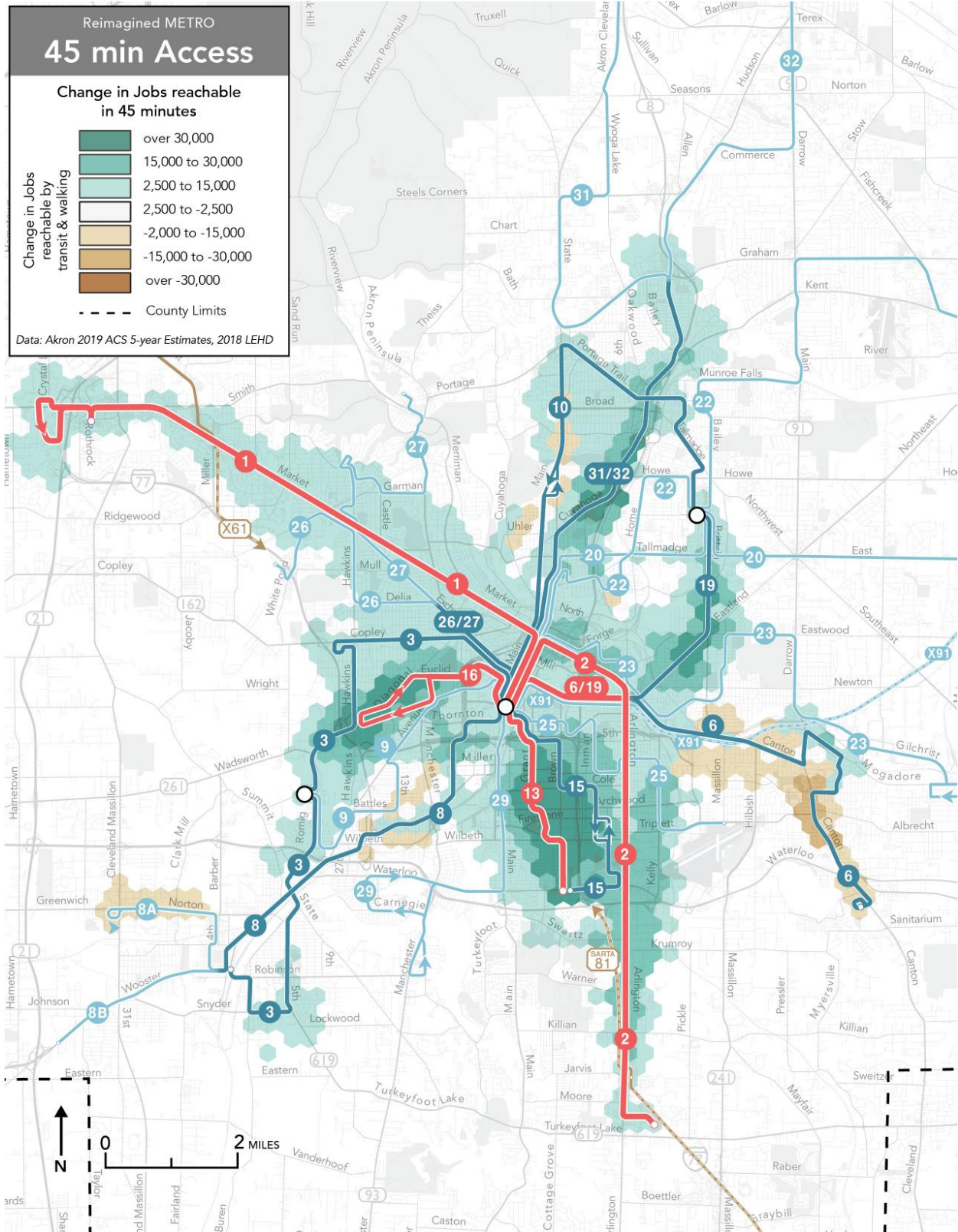
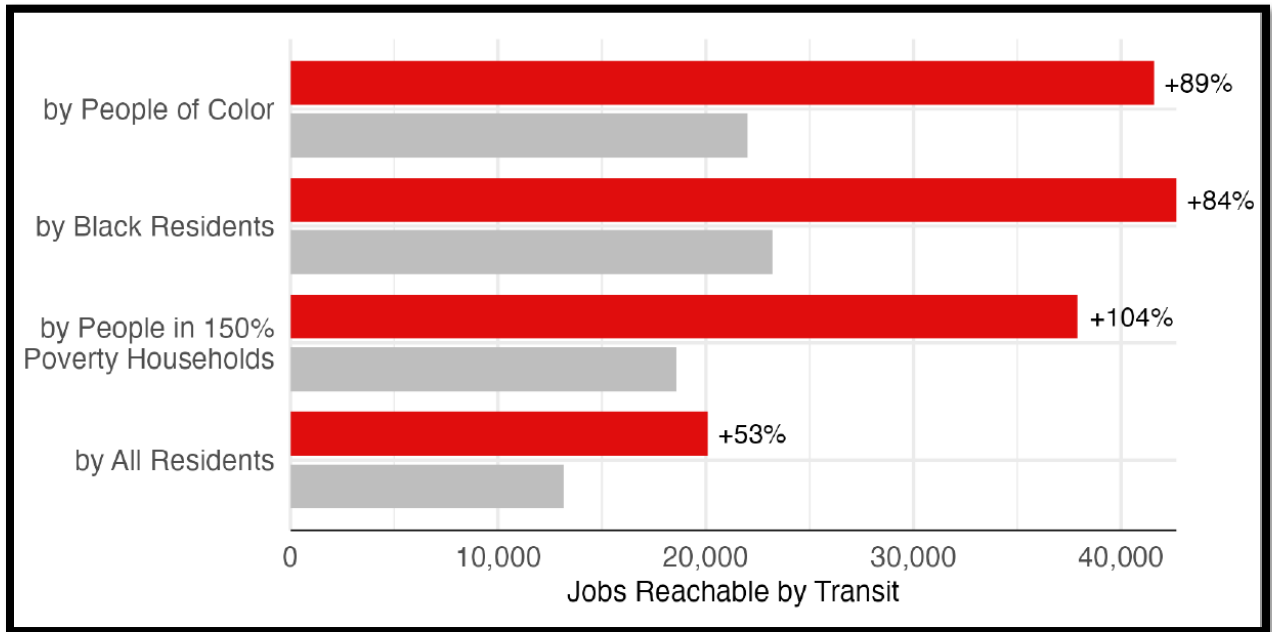


**Figure 10 – Reimagine METRO Job Access (Aggregated)**



**c. Service Standards Evaluation**

**i. Service Headway/Frequency**

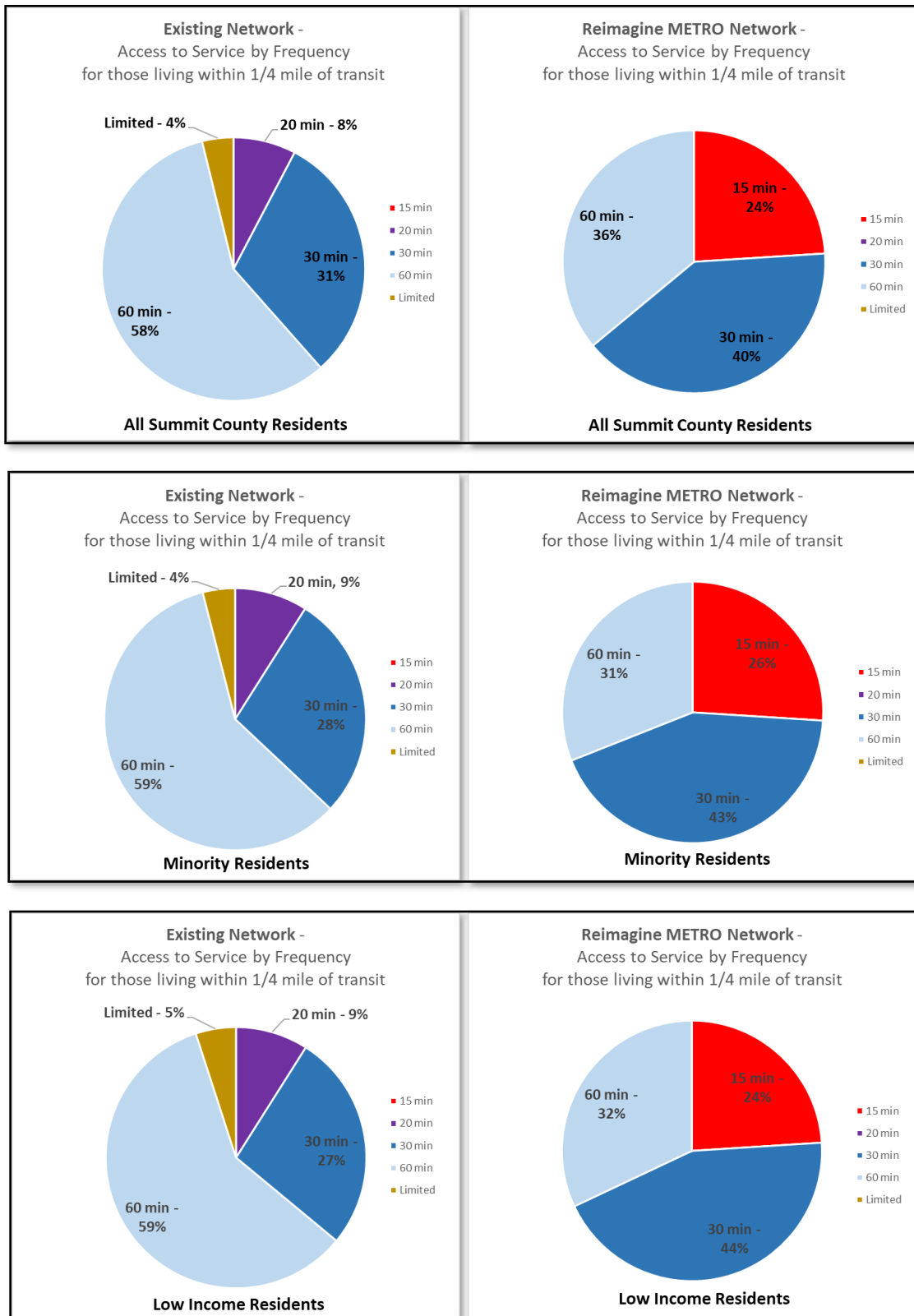
The addition of five high-frequency (15-min) corridors and three 30-min corridors provides an overall increase of frequency across the network, as shown in Figure 11 on the following page.

For all Summit County residents that are near the existing network, only 39 percent are near to 20 or 30 minute service. The remaining 61 percent are only near to 60 minute or limited service. With the Reimagined Network, 64 percent of residents near transit are near to 15 or 30 min service.

For minority residents that are near the existing network, only 37 percent are near to 20 or 30 minute service. The remaining 63 percent are only near to 60 minute or limited service. With the Reimagined Network, 69 percent of residents near transit are near to 15 or 30 min service.

For low income residents that are near the existing network, only 36 percent are near to 20 or 30 minute service. The remaining 64 percent are only near to 60 minute or limited service. With the Reimagined Network, 68 percent of residents near transit are near to 15 or 30 min service.

**Figure 11 – Access to Service by Frequency Category (Existing and Reimagine METRO Networks)**



## **ii. Directness of Service**

Improvements to service directness and creating more linear routes was a driving principle of the Reimagine METRO planning process. This can be seen visually when comparing the existing service map to the proposed Reimagine METRO network map.

Using the same number of resources, the Reimagine METRO network was able to increase frequency coupled with increased access to jobs and destinations throughout the County. This was accomplished in part by streamlining the existing routes, many of which operated on meandering and indirect paths at frequencies of 60 minutes.

Much of the benefit of the more streamlined and direct routes is realized within the City of Akron, where there is the highest concentration of low income and minority households, as shown on Figures 6 and 8.

## **iii. Span of Service**

In addition to direct service, streamlined and consistent service was also a guiding force when designing the schedules for the Reimagine METRO network. In Figure 12, you can see significant inconsistency in the span of service for each route. Some routes operate all day, some start late and/or end early, while some only have sporadic trips throughout the day.

In the Reimagine METRO network, as shown in Figure 13, a considerable service span will be consistent throughout the day. While frequencies taper off in the early morning and later evening hours, nearly all routes will begin and end service at the same time. This allows for more consistent connections between routes throughout the day, allowing riders to realize the benefits of the increased destination access at all the times that all routes are running.

### Figure 12 – Existing Network Frequency and Span of Service

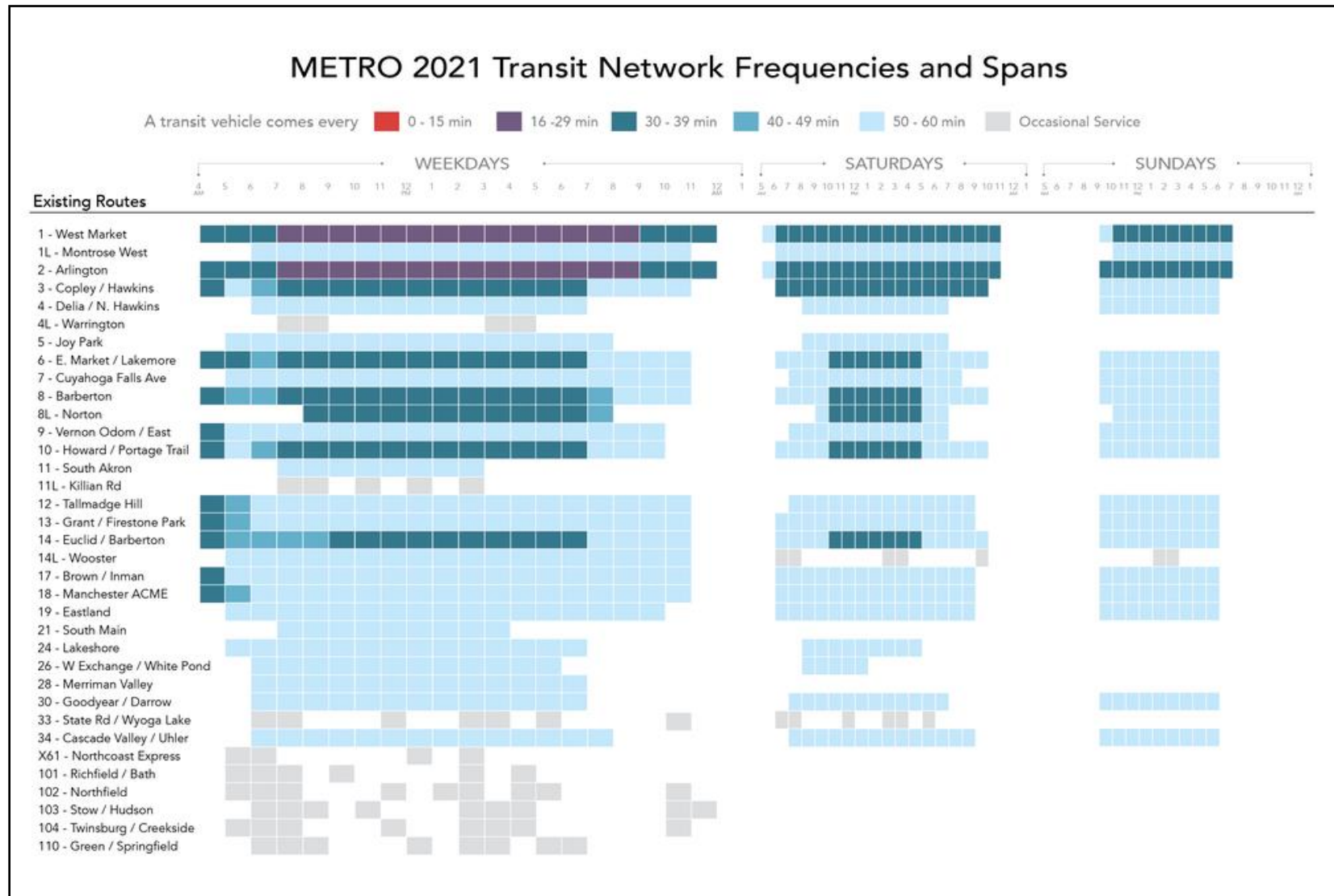
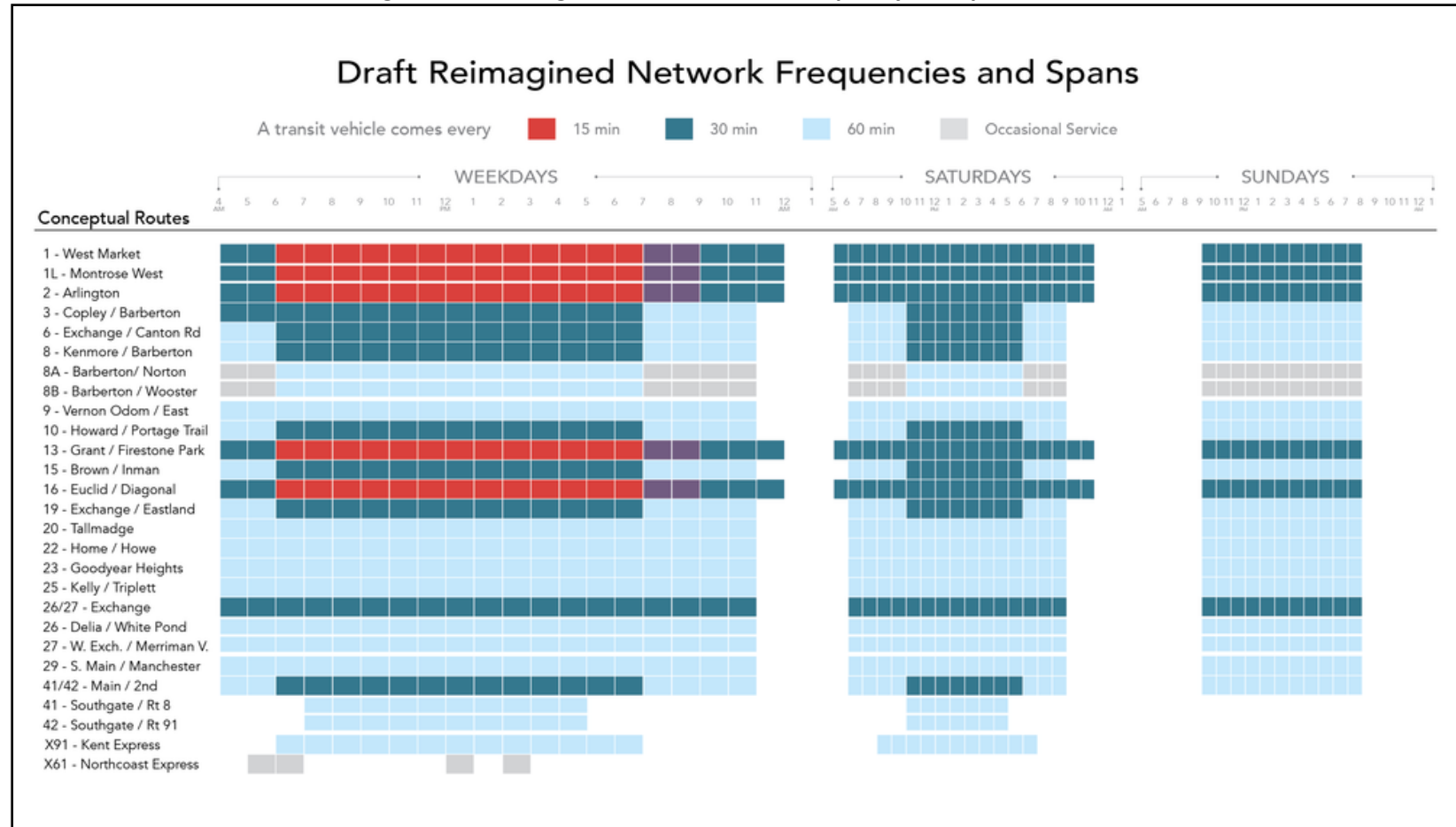


**Figure 13 – Reimagine METRO Network Frequency and Span of Service**



#### iv. Vehicle Load Factors

When designing the Reimagine METRO network, increases in frequency were focused on routes and/or corridors with the highest ridership in the existing network. Providing more service on higher ridership corridors will, in turn, reduce vehicle loads.

Table 2 shows METRO's existing routes, ordered by ridership (October 2022) from highest to lowest. It then shows a comparison of the existing frequency with the proposed Reimagine METRO frequency. These frequencies can be compared visually in Figures 3 and 4. As shown in the table, the higher ridership routes see the most increases in frequency.

**Table 2 – Frequency Comparison (Existing and Reimagine METRO Routes)**

| Ridership and Frequency by Route (ordered by existing ridership) |                        |                 |                        |                    |                           |   |
|------------------------------------------------------------------|------------------------|-----------------|------------------------|--------------------|---------------------------|---|
| Existing Route #                                                 | Route Name             | Minority Route? | October 2022 Ridership | Existing Frequency | Reimagine METRO Frequency |   |
| 1                                                                | West Market            | Yes             | 38,032                 | 20                 | 15                        | + |
| 2                                                                | Arlington              | Yes             | 35,883                 | 20                 | 15                        | + |
| 14                                                               | Euclid/Barberton XP    | Yes             | 22,257                 | 30                 | 15/30                     | + |
| 6                                                                | East Market/Lakemore   | Yes             | 20,747                 | 30                 | 30                        | = |
| 3                                                                | Copley Rd/Hawkins      | Yes             | 20,318                 | 30                 | 30                        | = |
| 10                                                               | Howard/Portage Trail   | Yes             | 20,297                 | 30                 | 30                        | = |
| 8                                                                | Kenmore/Barberton      | No              | 18,427                 | 30                 | 30                        | = |
| 13                                                               | Grant/Firestone Park   | Yes             | 12,441                 | 60                 | 15                        | + |
| 18                                                               | Thornton/Manchester    | Yes             | 11,135                 | 60                 | 60                        | = |
| 17                                                               | Brown/Inman            | Yes             | 10,982                 | 60                 | 30/60                     | + |
| 7                                                                | Cuyahoga Falls Ave     | Yes             | 10,912                 | 60                 | 30/60                     | + |
| 19                                                               | Eastland               | Yes             | 9,865                  | 60                 | 30                        | + |
| 9                                                                | Wooster/East Ave       | Yes             | 9,285                  | 60                 | 60                        | = |
| 12                                                               | Tallmadge Hill         | Yes             | 8,909                  | 60                 | 60                        | = |
| 34                                                               | Cascade Village/Uhler  | Yes             | 8,792                  | 60                 | 60                        | = |
| 4                                                                | Delia/N Hawkins        | Yes             | 7,437                  | 60                 | 60                        | = |
| 30                                                               | Goodyear/Darrow        | Yes             | 6,948                  | 60                 | 60                        | = |
| 5                                                                | East Market/Ellet      | Yes             | 6,317                  | 60                 | 60                        | = |
| 54                                                               | DASH Circulator        | Yes             | 4,695                  | 15                 | 15                        | = |
| 28                                                               | Merriman Valley        | Yes             | 4,234                  | 60                 | 60                        | = |
| 26                                                               | W Exchange/White Pond  | Yes             | 3,961                  | 60                 | 60                        | = |
| 24                                                               | Lakeshore              | Yes             | 3,014                  | 60                 | 30                        | = |
| 33                                                               | State Rd/Wyoga Lake    | No              | 3,007                  | 60                 | 60                        | = |
| 21                                                               | South Main             | Yes             | 2,126                  | 60                 | 60                        | = |
| 102                                                              | Northfield Express     | No              | 2,069                  | 90+                | 60                        | + |
| 11                                                               | South Akron            | Yes             | 1,872                  | 60                 | 15/30                     | + |
| 110                                                              | Green/Springfield      | No              | 1,808                  | 90+                | N/A                       | - |
| 61                                                               | NCX Montrose/Cleveland | No              | 1,803                  | 90+                | 90+                       | = |
| 103                                                              | Stow/Hudson            | No              | 1,510                  | 90+                | 60                        | + |
| 104                                                              | Twinsburg Creekside    | No              | 1,423                  | 90+                | 60                        | + |
| 101                                                              | Richfield/Bath         | No              | 628                    | 90+                | N/A                       | - |

**d. Determination of Disparate Impact or Disproportionate Burden**

According to METRO's Disparate Impact and Disproportionate Burden policy, a major service change should not adversely affect (loss) or benefit (gain) a minority or low-income population twenty percent (20%) more or less than non-minority or non-low income populations as determined by demographic analysis of proposed changes and U.S. Census data and/or transit rider survey data. This level of impact will be considered a disparate impact on minority populations, or a disproportionate burden on low income populations. The determination of adverse impact is based on the federal standard described in Uniform Guidelines published by the Equal Employment Opportunity Commission (EEOC) known as the "four-fifths rule." This standard requires benefits to accrue to unprotected populations at a rate at least four fifths (or 80%) of the rate for protected populations. The maximum acceptable difference (positive or negative) in level of benefit between protected and unprotected populations is 20 percent.

Based on the three methodologies outlined above, the following determinations of Disparate Impact or Disproportionate Burden can be made:

**i. People-Trips**

The number of people-trips within ¼ of transit service increases by 33.7 percent across the entire Summit County population. The increase is 35.2 percent for Minority populations and 32.7 percent for non-Minority populations. Similarly, the increase is 29.3 percent for Low Income populations and 35.4 percent for non-Low Income populations.

Since the Reimagine METRO major service changes results in an increase of service, the four-fifths rule dictates that minority and low-income populations should realize at least 80 percent of the benefit as the unprotected population. This is calculated by dividing the percentage increase for low-income or minority populations by the percentage increase for non-low income or non-minority populations.

**Low Income:**

29.3% Low Income increase / 35.4% non-Low Income increase  
= 82.8% > 80%  
= **No Disproportionate Burden on Low Income Populations**

**Minority:**

35.2% Minority increase / 32.75 non-Minority increase  
= 107.8% > 80%  
= **No Disparate Impact on Minority Populations**

## ii. Access to Opportunity

For people who live near transit, the number of jobs reachable within 45 minutes using transit increases by 53 percent for the median Summit County resident when compared to the existing network. This number increases to 104 percent for low income residents and 89 percent for minority populations.

Since the relative benefit for low income and minority residents living near transit is greater than the benefit for the median Summit County resident, this results in **No Disproportionate Burden** for low income residents and **No Disparate Impact** for minority residents.

## iii. Service Standards Evaluation

### • Headway/Frequency

The addition of five high-frequency (15-min) corridors and three 30-min corridors provides an overall increase of frequency across the network.

For people who live near transit, access to 30-min or better service increases:

- For all Summit County residents from 39% to 64%
- For minority residents from 37% to 69%
- For low income residents from 36% to 68%

Since the relative benefit for low income and minority residents living near transit is greater than the benefit for the median Summit County resident, this results in **No Disproportionate Burden** for low income residents and **No Disparate Impact** for minority residents.

### • Directness of Route, Span of Service and Vehicle Load

The Reimagine METRO plan create more direct routes, creates a consistent span of service (by increasing the span on routes that previously did not operate all day), and provides more service on our busiest corridors.

While a quantitative measure of impact is harder to demonstrate for these categories, the benefits of each of these changes will be most significantly realized in areas with high minority and low income populations, as shown in Figures 6 and 8.

Since the relative benefit for low income and minority residents living near transit is greater than the benefit for the median Summit County resident, this results in **No Disproportionate Burden** for low income residents and **No Disparate Impact** for minority residents.

## 6) Summary of Findings

METRO RTA has gone through an extensive planning process resulting in a 10-year Strategic Vision and a Transit Development Plan (titled Reimagine METRO). Both projects had extensive outreach efforts and incorporated the resulting feedback where feasible. The result is the proposed Reimagine METRO network shown in Figure 4. Given the magnitude of changes when compared to the existing network, this plan would result in a Major Service Change, as defined by METRO policy.

As a result, Title VI analysis was conducted to:

- Compare the minority population served before and after the planned change;
- Compare the low income population served before and after the planned change; and
- Compare the transit service quality before and after the planned change, as measured by service headway, directness of service, span of service and vehicle load factors.

These comparisons were done using a prescriptive approach through a combination of qualitative and quantitative analyses. Minority and Low Income impacts were compared to non-minority and non-low incomes impacts using people-trips (a measure of both service quantity and the number of people who are located near the service) and access to opportunity (the number of jobs reachable from different places in 45 minutes using transit). A comparison of transit service quality was also conducted using the metrics prescribed above.

The findings indicated that the proposed Reimagine METRO network results in **No Disproportionate Burden** for low income residents and **No Disparate Impact** for minority residents for each of the analysis methodologies presented above. In fact, in many cases, the positive impacts of the changes are realized more significantly for minority and low income populations.

## 7) Next Steps

METRO is currently conducting its final round of public outreach on the proposed Reimagine METRO network. Comments on the plan may be submitted online ([www.reimagine-metro.com](http://www.reimagine-metro.com)) or in-person at numerous meetings being held throughout the County in January and February 2023. Comments can also be submitted via phone at 330-762-0341. The final opportunity to provide comments will be at a public hearing held on March 1<sup>st</sup> at 6:00pm at the Akron-Summit County Main Library (60 S High St, Akron Ohio 44326. To be considered in the final evaluation of the draft plan, comments must be received by March 1<sup>st</sup>, 2023 at 8:00pm.

The METRO Board of Trustees will then be presented the compilation of comments received, any resulting recommendations for changes to the plan, and the above Title VI analysis at the March 2023 meeting.